04015.23

WW Engineering & Science
A Summit Company

May 24, 1994

Ms. Laura Ripley, Remedial Project Manager
U.S. Environmental Protection Agency
77 West Jackson Blvd., HSRL-6J
Chicago, IL 60604

RE: Meeting on May 13, 1994 Concerning the Wisconsin Steel Site

Dear Laura:

A meeting was conducted in the office of the U.S. EPA, Chicago, Illinois, on May 13, 1994 at which representatives of the Economic Development Administration of the Department of Commerce, the U.S. Army Corps of Engineers (Corps), Navistar, Illinois Environmental Protection Agency (IEPA), and U.S. EPA were in attendance. Attached is a sign-in sheet circulated at the meeting.

The meeting was chair by Eric Runkel of IEPA and the primary focus of discussion was on the Phase II Remedial Investigation statement of work (SOW) that has been prepared by the Corps of Engineers and reviewed by the IEPA and the U.S. EPA. Dick Leonard presented the field study tasks as revised by the Corps. The risk assessment SOW, prepared by the Corps, has just been submitted to the agencies for review.

Next, Edith Ardiente of Navistar and Roy Ball of ERM presented issues and objections to the proposed Corps SOW and presented alternative tasks to replace or complete the Phase II field study. Navistar has a stated goal to minimize the cost of the Phase II study. Navistar proposes to take a very aggressive stance that sampling only be conducted for constituents that present a high risk potential.

Navistar took exception to the following tasks:

Task 1: Navistar would eliminate the proposed deep wells. It is unclear if Navistar would complete the proposed additional shallow wells.

Task 3: Navistar did not like the proposed grid that the Corps has laid out. Navistar proposes to sample on progressively larger radii around each of the identified "hot spots".

eid c: & a:\ARCS\04015.23\wisconst

5555 Glenwood Hills Parkway SE PO Box 874 Grand Rapids, MI 49588-0874 616/942-9600 Fax 616/942-6499
Bloomington, IN Chattanooga, TN Columbus, OH Detroit, MI Indianapolis, IN Milwaukee, WI Minneapolis, MN

Task 4: Navistar objected to the proposed sampling areas as likely to contain clean topsoil which has been brought to each of the background sites. Navistar wants the background established as slag fill from the site (unaffected by site contamination).

Task 5: Navistar would eliminate sampling as it would not provide additional information to that available from ground water sampling and that the conduits leading off the site should be identified and plugged.

Task 6: Navistar would eliminate sampling since the source of contaminants in the Calumet River could be other nearby sites.

Task 7: Navistar would eliminate almost all of the TCLP analysis as relevant only to disposal of solid waste.

Task 8: Navistar proposed that the pump test should be scheduled as part of the remedial design if needed for the proposed remedial technologies.

The following are issues with the Navistar proposals or differences between the two proposals:

Navistar assumed throughout their analysis of the site that the Illinois Class II standards would be applied to the site.

Navistar assumes that all contaminants that pose a risk on the site have reached to ground water because of the age of the site.

Navistar proposes that five stratigraphic borings be completed in lieu of the deep wells. Navistar would return and install four to eight wells in the uppermost water bearing unit below the Carmi Sand if the soil data from the borings warrant it. The proposed locations of the stratigraphic borings are not appropriate in the opinion of WWES because they are all located on the boundaries of the site in a manner which avoids any known contaminated areas.

Navistar would composite many of the soil samples. It was unclear if they meant vertically within one boring or from separate locations. IEPA does not recommend composite sampling for investigative purposes, particularly for volatiles. From a technical viewpoint WWES would object to composite sampling in these circumstances.

The Navistar approach to sampling of soils is sound. The method could certainly result in more samples than is proposed under the Corps SOW.

Navistar took the position that the recently completed Fish and Wildlife study and the work proposed in the Corps SOW do not prove that contaminants found in the river come from the Wisconsin Steel site and therefore the work should be eliminated. They are partially correct. The river study should probably be expanded up and down stream to provide identification of the contribution of the Wisconsin Steel site to the contaminant load of the river sediment.

Navistar objected to the TCLP which Eric Runkel identified as an IEPA requirement to drive the ARARs process.

Navistar asked for copies of the Risk Assessment SOW, the Fish and Wildlife report, all of the water level data collected to date, and the existing utilities map of the Wisconsin Steel site.

At the conclusion of the discussion, the Corps went back through the tasks and commented on items where they would make modifications to the SOW based upon the comments of Navistar:

1. the pump tests would be delayed to a later phase;
2. the Navistar soil sampling strategy would be adopted;
3. Task 5 would be modified to sample outfalls only and to reconsider a tracer study after completion of sampling;
4. the deep wells would be bored to rock and the wells set in the zone of highest contamination below the Carmi Sand; and
5. TCLP testing of the slag may not be representative and should be reconsidered.

The role of Navistar in the RI process was discussed. Negotiations are ongoing to reach a consent agreement in which Navistar would complete a voluntary cleanup. In the interim, Navistar could potentially take on the Phase II work based on the Corps SOW. Navistar has to accept the Corps SOW and generate a suitable work plan.

The schedule was discussed. The IEPA wants all of the field investigation completed in the 1994 field season. To accomplish that the revised Corps SOW needs to be submitted in mid-June. Two weeks are planned for regulatory agency review and then a meeting is proposed for June 29, 1994. The final SOW would be completed mid-July.

eid c: & a:\ARCS\04015.23\wisconst

Further comment: the background soil and ground water is an issue that needs further attention. Navistar raises a valid concern that we should know what the history of background soils has been. Also, steel mill slag has been used widely for fill and road construction, etc., so the perceived risk of the material is low. However, the site is filled at least partially with slag from its own production processes. The collection and use of background soils from the slag on site would allow any contaminants from the slag to remain untreated even if the concentrations are over IEPA standards or guidance.

If you have any questions or comments, please do not hesitate to call me.

Sincerely,

WW ENGINEERING & SCIENCE

Theodore A. Lietzke
Site Project Manager

cc: Pat Vogtman, PO, U.S. EPA
04015.23, 32

eid c: & a:\ARCS\04015.23\wisconst

Eric Rinkel	ILEPA	(217) 782-6760
[illegible]	[illegible]	(312) [illegible]
Ted Lietzke	WWES (USEPA)	(616) 942 9600
DICK LEONARD	[illegible]	716 879 4418
FRED BOGLIOLI	COE	716 879-4190
Joe ROSS	EDA	(202) 482-4965
Frank Monteferrante	EDA/DOC	(202) 482-4208
Edith Ardiente	Navistar	(312) 836-3051
ROY BALL	ERM	(708) 940-7200
Susan Hilgreak	ERM	
Ken Tindall	U.S. EPA	312/886-9825